



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

USDS SDNY

DOCUMENT

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February 16, 2022

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BY ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Ronald Goland & Isaiah Smith*, S1 21 Cr. 78 (KMW)

Dear Judge Wood:

The Government writes, on behalf of the parties, in advance of the conference scheduled in this matter for February 22, 2022. In short, the parties submit that an adjournment, and corresponding exclusion time, of approximately 90 days would be appropriate.

The Government and defendant Isaiah Smith have reached an agreement on a pretrial disposition. In accordance with the Court's instructions, the parties will promptly schedule a change of plea proceeding in Magistrate's Court. The Government and defendant Ronald Goland are continuing to discuss a potential resolution and the parties believe that an adjournment would be appropriate to facilitate those discussion.

If the Court agrees, the Government respectfully requests that the Court exclude time, pursuant to 18 U.S.C. § 3161(h)(1)(A), until the date of the next conference. The Government submits that the ends of justice served by an exclusion of time outweigh the best interests of the defendants and the public in a speedy trial, because such an exclusion will allow the Government and defendant Isaiah Smith to schedule and conduct a change of plea hearing and all the Government and defendant Ronald Goland to continue discussing a potential resolution with the. In addition, such an exclusion will help ensure the effective assistance of counsel and help avoid any possible miscarriage of justice. Counsel for both defendants consent to the request.

The conference is adjourned to
May 24, 2022, at 11:00 a.m.
Time is excluded, pursuant to
18 USC 3161(h)(1)(A), through
May 24, 2022

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:

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Justin V. Rodriguez
Assistant United States Attorney
Southern District of New York
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SO ORDERED: N.Y., N.Y.

2/16/22

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.